

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.:
	:	1:CR-00-00289-001
v.	:	
	:	ELECTRONICALLY FILED
ALONZO THORNTON,	:	(Judge Rambo)
Defendant	:	

MOTION FOR RELIEF UNDER 18 U.S.C. §3582(c)

AND NOW, comes Alonzo Thornton, by his attorney, L. Rex Bickley, Esquire, on behalf of the Defendant Alonzo Thornton and files this Motion for Relief Under 18 U.S.C. §3582(c). In support thereof, it is averred as follows:

1. On March 9, 2001, Defendant pled guilty to Count II of a Federal Superseding Indictment.
2. The offense for which Defendant plead was Count II - Conspiracy to Distribute Crack Cocaine in violation of 21 USC Section 846.
3. On March 9, 2001, the Defendant was sentenced to a term of imprisonment of 180.
4. The 2000 edition of the United States Sentencing Guidelines Manual was used to calculate Alonzo Thornton's sentencing guideline range.

5. Alonzo Thornton is serving this sentence in FCI Ft. Dix.
6. Alonzo Thornton's projected release date is June 15, 2014.
7. In the United States Sentencing Guidelines Manual effective November 1, 2007, the United States Sentencing Commission amended the drug Quantity Table and reduced the offense level involving crack cocaine.
8. The Presentence Report determined that Mr. Thornton was responsible for 1103 grams of crack cocaine.
9. The Presentence Report calculated his offense level at 36.
10. With various enhancements and Acceptance of Responsibility his final offense level was 41.
11. Based on the total offense level of 41 and a criminal history category of II, the custody range was determined to be 360 months to life.
12. On January 16, 2002, the Defendant was sentenced to a term of imprisonment of 180 months.
13. The sentence the Defendant received was based in part on the fact that he cooperated and benefited from a 5(k)(1) motion filed by the government.
14. On December 12, 2007, the United States Sentencing Commission announced its decision to apply the amendments to the crack guidelines retroactively effective March 3, 2008.
15. Pursuant to 18 U.S.C. §3582(c)(2), "in the case of a defendant who has

been sentenced to a term of imprisonment based on a sentencing range that has subsequently been lowered by the Sentencing Commission. . . upon motion of the defendant. . . the Court may reduce the term of imprisonment, after considering the facts set forth in section 3553(a) to the extent that they are applicable,”

16. Because Alonzo Thornton had been sentenced to a term of imprisonment based on a sentencing range that has subsequently been lowered by the Sentencing Commission, he moves this Honorable Court to reduce the term of imprisonment in accordance with 18 U.S.C. §3582(c)(2).

17. The Defendant requests that this Court fashion a sentence reduction that it deems appropriate and in consideration of the factors as set forth in Section 3553(a).

Date: July 24, 2008

/s/ L. Rex Bickley
L. Rex Bickley
114 South St.
Harrisburg, PA 17101
717-234-0577
717-234-7832 fax

CERTIFICATE OF SERVICE

I, L. Rex Bickley, counsel for Alonzo Thornton, certify that on this 24th day of July, 2008, I electronically served said Motion on Assistant U.S. Attorney Bill Behe and by US Mail, postage prepaid at Harrisburg, PA to Alonzo Thornton

/s/ L. Rex Bickley
L. Rex Bickley,
Attorney for Alonzo Thornton